



401 Edgewater Place, Suite 600
Wakefield, MA 01880
tel: 781-876-8915 • fax: 781-623-6107
email: info@lspa.org • www.lspa.org

December 18, 2015

Mr. Kendall Marra, Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection
One Winter Street
Boston, Massachusetts 02108

Subject: LSPA Comments on Second Public Review Draft
LIGHT NONAQUEOUS PHASE LIQUIDS (LNAPL) AND THE MCP: GUIDANCE for SITE ASSESSMENT AND CLOSURE, Policy #WSC-14-450

Dear Mr. Marra:

The LSPA is pleased to provide comments on this Second Public Review Draft of the LNAPL guidance. We appreciate the opportunities MassDEP has provided for extended discussion on this challenging topic, primarily with our Regulations Committee LNAPL workgroup.

The attached matrix of comments is reflective of our understanding of the approach MassDEP has taken regarding this topic. While the LSPA may not fully agree with all of MassDEP's assumptions, we do recognize that the MCP continues to include notification requirements based on the detection of NAPL thickness in groundwater monitoring wells.

As articulated in the LSPA's 2005 and 2008 White Papers, thickness of NAPL in a well is not necessarily a good indicator of risk or the necessity of implementing response actions. The LSPA continues to support basing reportable conditions on proximity to receptors and not thickness. We are respectful of our different approaches and hope to continue professional conversations on this topic.

As always, we look forward to continuing to work with MassDEP and thank you again for the opportunity to provide comments.

Sincerely,

LSP Association, Inc.

Kevin Beaulieu, LSP, President

Wendy Rundle, Executive Director

Attachment: December 18, 2015 Compilation of Comments from the LSPA